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January 22, 2019

Via ECF

The Honorable Christina Reiss
United States District Court, District of Vermont
P.O. Box 446
Burlington, VT 05402-0446

Re: *Black Love Resists in the Rust et al. v. City of Buffalo et al.*; No. 18-CV-719

Dear Judge Reiss:

The National Center for Law and Economic Justice, along with the Center for Constitutional Rights and the Western New York Law Center, represents the Plaintiffs in *Black Love Resists in the Rust et al. v. City of Buffalo et al.* We write to advise the Court of the current status of discovery in this matter.

Following the telephone conference held on December 21, 2019, the parties continued to confer with respect to Plaintiffs' discovery requests. Defendants supplemented their document production on Saturday, January 19, and provided additional informal responses on January 20 and 21. Plaintiffs have been able to review some, but not all, of Defendants' production. Plaintiffs continue to anticipate the need for court intervention, but because we have not yet been able to review Defendants' entire production, we cannot identify which matters remain in dispute. Accordingly, Plaintiffs request an additional week, until Tuesday, January 29, to contact the court regarding issues that the parties cannot resolve. Defendants do not object to this request.

Thank you very much for your consideration of this request.

Respectfully Submitted,

A handwritten signature in blue ink, appearing to read "Claudia Wilner", is written over a horizontal line.

Claudia Wilner
Senior Attorney

Cc: All counsel of record (via ECF)